



Amanda Klevorn  
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April 24, 2024

Honorable Michael A. Shipp, U.S.D.J.  
United States District Court  
Clarkson S. Fisher Building & US Courthouse  
402 East State Street  
Trenton, NJ 08608

Honorable Rukhsanah L. Singh, U.S.M.J.  
United States District Court  
Clarkson S. Fisher Building & US Courthouse  
402 East State Street  
Trenton, NJ 08608

Re: *Johnson & Johnson Talcum Powder Products, Marketing, Sales Practices and Products Liability Litigation*  
Case No.: 3:16-md-02738-MAS-RLS

Dear Judge Shipp and Judge Singh:

The PSC respectfully requests leave of Court to file a short reply of ten pages or less in support of their Motion for Reconsideration of the Court's March 27, 2024 Text Order For a Full Refiling of *Daubert* Motions. ECF No. 31080. Defendants' Opposition raises arguments that the PSC seeks to briefly address, including certain claims about purported "new" studies, experts, and opinions, as well as Defendants' contention that it is not manifestly unjust to require a full refiling of all *Daubert* motions. ECF No. 32026.

The PSC's Motion for Reconsideration is noticed for May 6. The PSC therefore submits that if the Court grants them leave to file a reply, the reply would be filed no later than April 29.

Thank you for your consideration of this request.

Respectfully,

**BURNS CHAREST LLP**

A handwritten signature in blue ink, appearing to read "Amanda Klevorn", written over a horizontal line.

Amanda Klevorn, Partner

cc: Susan Sharko, Esq. (via email)  
Stephen D. Brody, Esq. (via email)  
All Counsel (via ECF)